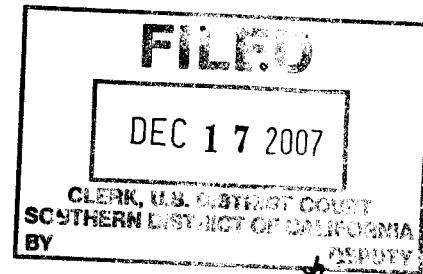


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7 UNITED STATES DISTRICT COURT
8 SOUTHERN DISTRICT OF CALIFORNIA

9 UNITED STATES OF AMERICA,) Criminal Case No. '07 CR 3340 JM
10 Plaintiff,)
11 v.)
12 DEAN MILLER,)
13 Defendant.)
14 _____
15

16 The United States Attorney charges:

17 Count 1

18 Beginning on a date unknown and continuing up to and including
19 August 2002, within the Southern District of California, and
20 elsewhere, defendant DEAN MILLER did knowingly and intentionally
21 conspire with others known and unknown to transport, transmit, and
22 transfer, monetary instruments and funds, to wit: approximately
23 \$221,000 in United States dollars from a place in the United States
24 to and through places outside the United States with the intent to
25 promote the carrying on of specified unlawful activity, to wit:
26 trafficking in counterfeit goods; in violation of Title 18, United
27 States Code, Sections 1956(a)(2)(A) and 1956(h).

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Count 2

2 Beginning on a date unknown, and continuing up to and including
3 January 2003, within the Southern District of California and
4 elsewhere, defendant DEAN MILLER did knowingly and intentionally
5 conspire with others known and unknown to commit an offense against
6 the United States, that is, to traffic in good and services and
7 knowingly used a counterfeit mark, to wit: counterfeit Marlboro brand
8 cigarettes, with spurious marks that were identical and substantially
9 indistinguishable from marks registered for authentic Marlboro
10 cigarettes in the principal register of the United States Patent and
11 Trademark Office and in use, in violation of Title 18, United States
12 Code, Sections 2320 and 2320 (e) (1) (A) (ii).

13

OVERT ACTS

14 In furtherance of said conspiracy and to effect he objects
15 thereof, the following overt acts, among others were committed in the
16 Southern District of California, and elsewhere:

17

1. In or about August 2002, in the San Diego, California,
18 Defendant DEAN MILLER directed the shipment of
19 approximately 500 cases of counterfeit Marlboro cigarettes
20 from a location in the Central District of California to
21 a customer in Spokane, Washington.

22

All in violation of Title 18, United States Code, Section 371.

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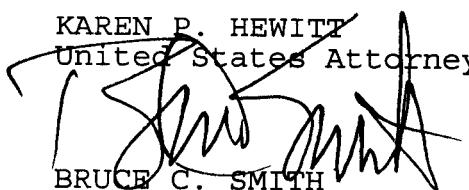
DATED: DECEMBER 11, 2007

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KAREN P. HEWITT
United States Attorney

BRUCE C. SMITH
Assistant U.S. Attorney